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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re) Case No. 16-30406-rld11
)
SeaPort Airlines, Inc.,) MOTION TO EXTEND TIME TO FILE EMBARK
) AVIATION CORP.'S INTERIM FEE
) APPLICATION
Debtor-in-Possession.)

Debtor-in-Possession, SeaPort Airlines, Inc. ("Debtor"), moves the Court for entry of an Order extending the deadline for filing the interim fee application for Embark Aviation Corp. ("Embark"). Currently, the deadline is June 30, 2016, as set in this Court's Order of May 12, 2016 (Dkt. No. 285). Debtor requests an extension through and including August 29, 2016. Debtor and Debtor's counsel are in the process of drafting and preparing Debtor's Disclosure Statement and Plan of Reorganization for filing on or before the deadline of July 11, 2016 and need additional time to prepare the Embark fee application after completion of the Plan and Disclosure Statement.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
Of Attorneys for Debtor-in-Possession

CERTIFICATE - TRUE COPY

DATE: June 30, 2016

DOCUMENT: MOTION TO EXTEND TIME TO FILE EMBARK AVIATION
CORP.'S INTERIM FEE APPLICATION

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
816 SW First Avenue
Portland, Oregon 97204

Michael J. Edelman
VEDDER PRICE
1633 Broadway, 47th Floor
New York, New York 10019

Dan McAllister
Treasurer-Tax Collector
Attention: Bankruptcy Desk
1600 Pacific Highway, Room 162
San Diego, California 92101

Franklin C. Adams
POB 1028
Riverside, CA 92502-1028

Tulare County Tax Collector
Attn Jorge Garcia
Deputy Tax Collector
221 S Mooney Blvd Rm 104-E
Visalia, CA 93291-4593

Mark J. Wolfson
100 N Tampa St #2700
Tampa, FL 33602

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: June 30, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
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